

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

| | | |
|--------------------------------------|---|-----------------------------------|
| Laura E. Bayer |) | CHAPTER 13 |
| Debtor |) | |
| |) | CASE NO. 1:22-bk-00497-HWV |
| Ally Bank |) | |
| Movant |) | |
| |) | |
| Laura E. Bayer |) | |
| |) | |
| JACK N. ZAHAROPOULOS, TRUSTEE |) | |
| Debtor/Respondent |) | |

**DEBTOR'S RESPONSE TO ALLY BANK MOTION FOR RELIEF FROM THE
AUTOMATIC STAY UNDER 11 U.S.C. 362 PURSUANT TO BANKRUPTCY
PROCEDURE RULE 4001**

1. Movant, Ally Bank, filed its Motion for Relief from Stay on December 21, 2022.
2. Debtor acknowledges some auto payments are past due.
3. Debtor desires the opportunity to cure any post-petition auto arrears and keep her automobile.
4. Debtor requests the Court deny Movant's Motion for Relief.

WHEREFORE, Debtor, Laura E. Bayer, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed December 21, 2022, by Ally Bank.

Dated: December 22, 2022

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